05-44481-rdd Doc 7218 Filed 03/08/07 Entered 03/14/07 14:32:30 Main Document Pg 1 of 18

Response Date and Time: March 15, 2007 at 4:00 pm

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IM	RE.

DELPHI CORPORATION, et al., Debtors,

Chapter 11 Case No. 05-44481 (RDD) (Jointly Administered)

Response to the Debtors' Ninth Omnibus Claims Objection

COMES NOW CTP Carrera, Inc. d/b/a Carclo Technical Plastics ("Carclo"), a Delphi creditor, files this Response to the Debtors' Ninth Omnibus Objection to Claims:

- 1. Carclo was a supplier of custom plastic injection molded parts to Delphi Mechatronic Systems ("Debtor") and has been for several years.
- 2. On October 8, 2005, Delphi Corporation and certain of its subsidiaries and affiliates, including Debtor, filed voluntary petitions in this Court for reorganization under Chapter 11 of the United States

 Bankruptcy Code. This Court entered an Order directing the joint administration of the Debtors Chapter 11 cases.

05-44481-rdd Doc 7218 Filed 03/08/07 Entered 03/14/07 14:32:30 Main Document Pg 2 of 18

3. On June 1, 2006, Carclo filed its proof of claim against the Debtor, in the amount of \$1,870.85, Claim No. 7311 (the "Claim").

4. The Claim is based on amounts owed by the Debtor to Carclo for products sold and delivered to Debtor prior to the filing of the bankruptcy, (the "Product").

5. On September 6, 2005, September 12, 2005, September 19, 2005, September 26, 2005 and October 3, 2005 Carclo, at the direction of Debtor, under Debtor's purchase order number 9571-05416, Carclo sold and delivered the Product to Debtor. Copies of the invoices, packing slips and tracking detail showing the material, price and delivery of the Product via UPS to Debtor are attached hereto and made a part hereof as Exhibit A.

6. Debtor generally asserts that Carclo's Claim should be disallowed because the liability does not appear to be owing pursuant to the Debtors' books and records. Although Debtor claims the entire Claim should be removed, the Schedule F filed by Debtor showed \$1,446.54 due and owing to Carclo Technical Plastics of pre-petition debt.

7. Debtor's objections to Carclo's Claim are merely general assertions and the Debtor fails to provide any specific evidence or documentation in support of their objection. The supporting documents attached to Carclo's Claim and Exhibit A, attached hereto, establish the basis for Carclo's Claim. The Claim is based upon the fair and reasonable prices for the Product and the prices to which the Debtor agreed to pay.

WHEREFORE, Carclo respectfully requests that this Court overrule the Debtors' objection to Carclo's Claim and allow Carclo's Claim in the amount of \$1,870.85.

Dated: March 7, 2007

Respectfully submitted:

CTP CARRERA, INC., d/b/a CARCLO TECHNICAL PLASTICS

Diane K. McNealy, Chief Financial Officer

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

DELPHI CORPORATION, et al., Debtors,

Chapter 11

Case No. 05-44481 (RDD) (Jointly Administered)

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Response to the Debtors' Ninth

Omnibus Claims Objection was mailed to the following by first class U. S. mail, postage pre-paid, on this

7th day of March, 2007:

Honorable Robert D. Drain
United States Bankruptcy Judge
United States Bankruptcy Court
for the Southern District on New York
One Bowling Green, Room 610
New York, New York 10004

Delphi Corporation 5725 Delphi Drive Troy, MI 48098 Attn: General Counsel

John Wm. Butler, Jr. Skadden, Arps, Slate, Meagher & Flom, LLP. 333 West Wacker Drive, Suite 2100 Chicago, IL 60606 John K. Lyons Skadden, Arps, Slate, Meagher & Flom, LLP. 333 West Wacker Drive, Suite 2100 Chicago, IL 60606

Joseph N. Wharton Skadden, Arps, Slate, Meagher & Flom, LLP. 333 West Wacker Drive, Suite 2100 Chicago, IL 60606

> CTP CARRERA, INC., d/b/a CARCLO TECHNICAL PLASTICS

By: Diane K. McNealy, Chief Fifnancial Officer

05-44481-rdd Doc 7218 Filed 03/08/07 Entered 03/14/07 14:32:30 Main Document Pg 4 of 18

teghnical plastics CTP Carrera 600 Depot Street Latrobe, PA 15850 Tel: (724)539-1833 Fax: (724)539-6620 DUNS #: 107329708

Invoice

Invoice No.:

LIN14580

Invoice Date:

09/06/05

Page:

1

Ship-to Address:

Delphi Mechatronics Systems 615 Elca Lane, Suite A Brownsville, TX 78521

Bill-to Address:

Bill-to Customer No.:

Delphi Mechatronics Systems 615 Elca Lane, Suite A Brownsville, TX 78521

Ship Via:

UPS/ORANGE

PED MECH

Payment Terms:

Net 60

Payment Due Date: FOB:

11/05/05 Latrobe, PA Ship Date:

09/06/05

Your PO Number:

9571-054161

Line	Item:	Quantity:	Units:	Unit Price:	Amount:
1	15416386 Rev 03 outside air temp sensor	1,600	EACH	0.14616	233.86
		ln	voice Total	(US DOLLARS):	233.86

PLEASE REMIT PAYMENT TO:
CTP CARRERA
PO BOX 752193
CHARLOTTE, NC 28275-2193
OR WIRE TO:
ACCT #:2003207779498
ROUTING #: 053207766

Pack Slip

Bill-to:

Delphi Mechatronics Systems

615 Elca Lane, Suite A Brownsville, TX 78521 Pack Slip No

Pack Slip Date: Payment Terms:

Page:

LTD14580

09/06/05 Net 30

Ship Code:

BROWNSVILL

Ship-to:

Delphi Mechatronics Systems

Delphi Mechatronics Systems

615 Elca Lane, Suite A Brownsville, TX 78521 Your PO No:

FOB:

Ship Via:

9571-054161

Latrobe, PA **UPS/ORANGE**

	Rev.	Description:	Quantity Shipped:	No of Cartons:	Standard Pack:	Weight:
Part Number: 15416386	No.: 03	outside air temp sensor	1,600	1	1,600	14

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REF 1: REF 2:

HANDLING CHARGE \$0.00

REFERENCE RATE CHARGES: SERVICE \$F/C \$0.00 COD \$0.00 RS \$0.00 DC \$0.00 HZMT \$0.00 SD \$0.00 \$0.00 NTFY \$0.00 SP \$0.00 TOT REF CHG \$24.10 REF+HANDLING \$24,10



Tracking Detail

Your package has been delivered.

Tracking Number:

1Z 265 517 12 4261 352 0

Type:

Package

Status:

Delivered

Delivered on:

09/09/2005 10:38 A.M.

Signed by:

E SALINAS

Location:

DOCK

Delivered to:

BROWNSVILLE, TX, US

Service Type:

3 DAY SELECT

Package Progress

Location	Date	Local Time	Description
BROWNSVILLE, TX, US	09/09/2005	10:38 A.M.	DELIVERY

Tracking results provided by UPS: 02/21/2007 11:41 A.M. EST (USA)

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Close Window

05-44481-rdd Doc 7218 Filed 03/08/07 Entered 03/14/07 14:32:30 Main Document Pg 7 of 18

technical plastics CTP Carrera 600 Depot Street Latrobe, PA 15650 Tel: (724)539-1833 Fax: (724)539-6620 DUNS #: 107329708

Invoice

Invoice No.:

LIN14713

Invoice Date:

09/12/05

Page:

1

Ship-to Address:

Delphi Mechatronics Systems 615 Elca Lane, Suite A Brownsville, TX 78521

Bill-to Address:

Bill-to Customer No.:

Delphi Mechatronics Systems 615 Elca Lane, Suite A Brownsville, TX 78521

Ship Via:

UPS/ORANGE

Net 60

Payment Terms: Payment Due Date:

11/11/05

PED MECH

FOB:

Latrobe, PA

Ship Date:

09/12/05

Your PO Number:

9571-054161

 _		,			
Line	item:	Quantity:	Units:	Unit Price:	Amount:
1	15416386 Rev 03 outside air temp sensor	1,600	EACH	0.14616	233.86
	Outches an temperature	lr lr	voice Total	(US DOLLARS):	233.86

PLEASE REMIT PAYMENT TO:
CTP CARRERA
PO BOX 752193
CHARLOTTE, NC 28275-2193
OR WIRE TO:
ACCT #:2003207779498
ROUTING #: 053207766

Pack Slip

Bill-to:

Delphi Mechatronics Systems

615 Elca Lane, Suite A Brownsville, TX 78521 Pack Slip No

Pack Slip Date:

Payment Terms:

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Ship Code:

BROWNSVILL

Ship-to:

Delphi Mechatronics Systems Delphi Mechatronics Systems

615 Elca Lane, Suite A Brownsville, TX 78521 Your PO No:

FOB: Ship Via: 9571-054161

Latrobe, PA **UPS/ORANGE**

	Rev.	Description:	Quantity Shipped:	No of Cartons:	Standard Pack:	Weight:
Part Number: 15416386	No.: 03	outside air temp sensor	1,600	1	1,600	(14)

SERVICE 3DS

TRACKING# 1Z2655171240619466

REF 1: REF 2:

HANDLING CHARGE \$0.00

REFERENCE RATE CHARGES: SERVICE SF/C IV \$0.00 COD \$0.00 RS \$0.00 HZMT \$0.00 DC \$0.00 SD \$0.00 AH \$0.00 NTFY \$0.00 SP \$0.00 TOT REF CHG \$24.10 REF+HANDLING \$24.10



Tracking Detail

Your package has been delivered.

Tracking Number:

1Z 265 517 12 4061 946 6

Type:

Package

Status:

Delivered

Delivered on:

09/15/2005 12:00 P.M.

Signed by:

E SALINAS

Location:

DOCK

Delivered to:

BROWNSVILLE, TX, US

Service Type:

3 DAY SELECT

Package Progress

Location	Date	Local Time	Description
BROWNSVILLE,	09/15/2005	12:00 P.M.	DELIVERY

TX, US

Tracking results provided by UPS: 02/21/2007 11:39 A.M. EST (USA)

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Close Window

Invoice

Invoice No.:

LIN14865

Invoice Date:

09/19/05

Page:

1

Bill-to Address:

Bill-to Customer No.:

Delphi Mechatronics Systems 615 Elca Lane, Suite A Brownsville, TX 78521 Ship-to Address:

Delphi Mechatronics Systems 615 Elca Lane, Suite A Brownsville, TX 78521

Ship Via:

UPS/ORANGE

PED MECH

Payment Terms:

Net 60

Payment Due Date: FOB:

11/18/05 Latrobe, PA Ship Date:

09/19/05

Your PO Number:

9571-054161

Line	Item:	Quantity:	Units:	Unit Price:	Amount:
1	15416386 Rev 03 outside air temp sensor	3,200	EACH	0.14616	467.71
		1	nvoice Total	(US DOLLARS):	467.71

PLEASE REMIT PAYMENT TO:
CTP CARRERA
PO BOX 752193
CHARLOTTE, NC 28275-2193
OR WIRE TO:
ACCT #:2003207779498
ROUTING #: 053207766

Pack Slip

Bill-to:

Delphi Mechatronics Systems

615 Elca Lane, Suite A Brownsville, TX 78521 Pack Slip No

Pack Slip Date:

Payment Terms:

Page:

Net 30

LTD14865

09/19/05

Ship Code:

BROWNSVILL

Ship-to:

Delphi Mechatronics Systems

Delphi Mechatronics Systems

615 Elca Lane, Suite A Brownsville, TX 78521 Your PO No:

FOB: Ship Via: 9571-054161

Latrobe, PA UPS/ORANGE

	Rev. No.:	Description:	Quantity Shipped:	No of Cartons:	Standard Pack:	Weight:
Part Number: 15416386		outside air temp sensor	3,200	2	1,600	28

TRACKING# 1Z2655171242959765

REF 1: REF 2:

HANDLING CHARGE \$0.00

REFERENCE RATE CHARGES: SERVICE \$F/C IV \$0.00 COD \$0.00 RS \$0.00 DC \$0.00 HZMT \$0.00 SD \$0.00 AH \$0.00 NTFY \$0.00 SP \$0.00 TOT REF CHG \$48.20 REF+HANDLING \$48.20



Tracking Detail

Your package has been delivered.

Tracking Number:

1Z 265 517 12 4295 976 5

Type:

Package

Status:

Delivered

Delivered on:

09/22/2005 11:24 A.M.

Signed by:

E SALINAS

Location:

DOCK

Delivered to:

BROWNSVILLE, TX, US

Service Type:

3 DAY SELECT

Package Progress

Date

Local Time

Description

BROWNSVILLE,

09/22/2005

11:24 A.M.

DELIVERY

TX, US

Tracking results provided by UPS: 02/21/2007 11:39 A.M. EST (USA)

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Bill-to Customer No.:

615 Elca Lane, Suite A

Brownsville, TX 78521

Delphi Mechatronics Systems

Invoice

Invoice No.:

LIN14983

Invoice Date:

09/26/05

Page:

Ship-to Address: Bill-to Address:

Delphi Mechatronics Systems 615 Elca Lane, Suite A Brownsville, TX 78521

Ship Via:

UPS/ORANGE

PED MECH

Payment Terms:

Net 60

Payment Due Date:

11/25/05

FOB:

Latrobe, PA

Ship Date:

09/26/05

Your PO Number:

9571-054161

Line	Item:	Quantity:	Units:	Unit Price:	Amount:
1	15416386 Rev 03 outside air temp sensor	3,200	EACH	0.14616	467.71
	dutaide all temp sonos	 ln	voice Total ((US DOLLARS):	467.71

PLEASE REMIT PAYMENT TO: CTP CARRERA PO BOX 752193 CHARLOTTE, NC 28275-2193 OR WIRE TO: ACCT #:2003207779498 ROUTING #: 053207766

technical plastics СТР Саптега 600 Depot Street Latrobe, PA 15650 Tel: (724)539-1833 Fax: (724)539-6620 DUNS #: 107329708 .

Pack Slip

Bill-to:

Delphi Mechatronics Systems

615 Elca Lane, Suite A

Brownsville, TX 78521

Pack Slip No

Pack Slip Date:

Payment Terms:

Page:

LTD14983

09/26/05

Net 30

Ship Code:

BROWNSVILL

Ship-to:

Delphi Mechatronics Systems

Delphi Mechatronics Systems

615 Elca Lane, Suite A Brownsville, TX 78521 Your PO No:

FOB:

Ship Via:

9571-054161

Latrobe, PA

UPS/ORANGE

	Rev.	Description:	Quantity Shipped:	No of Cartons:	Standard Pack:	Weight:
Part Number:	No.: 03	outside air temp sensor	3,200	2	1,600	28
.15416386	0.5					

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AH \$0.00 \$48.20 TOT REF CHG

REF+HANDLING \$48.20



Tracking Detail

Your package has been delivered.

Tracking Number:

1Z 265 517 12 4129 155 9

Type:

Package

Status:

Delivered

Delivered on:

09/29/2005 11:26 A.M.

Signed by:

E SALINAS

Location:

DOCK

Delivered to:

BROWNSVILLE, TX, US

Service Type:

3 DAY SELECT

Package Progress

Location	Date	Local Time	Description
BROWNSVILLE,	09/29/2005	11:26 A.M.	DELIVERY

TX, US

Tracking results provided by UPS: 02/21/2007 11:39 A.M. EST (USA)

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05-44481-rdd Doc 7218 Filed 03/08/07 Entered 03/14/07 14:32:30 Main Document Carclo Pg 16 of 18

technical plastics CTP Carrera 600 Depot Street Latrobe, PA 15650 Tel: (724)539-1833 Fax: (724)539-6620 DUNS #: 107329708

Invoice

Invoice No.:

LIN15141

invoice Date:

10/03/05

Page:

1

Ship-to Address:

Delphi Mechatronics Systems 615 Elca Lane, Suite A Brownsville, TX 78521

Bill-to Address:

Bill-to Customer No.:

Delphi Mechatronics Systems 615 Elca Lane, Suite A Brownsville, TX 78521

Ship Via:

UPS/ORANGE

PED MECH

Net 60

Payment Terms: Payment Due Date:

12/02/05

FOB:

Latrobe, PA

Ship Date:

10/03/05

Your PO Number:

9571-054161

·				,	
Line	Item:	Quantity:	Units:	Unit Price:	Amount:
1	15416386 Rev 03 outside air temp sensor	3,200	EACH	0.14616	467.71
	Calonia an emp	ln	voice Total	US DOLLARS):	467.71

PLEASE REMIT PAYMENT TO:
CTP CARRERA
PO BOX 752193
CHARLOTTE, NC 28275-2193
OR WIRE TO:
ACCT #:2003207779498
ROUTING #: 053207766

t C

technical plastics CTP Carrera 600 Depot Street Latrobe, PA 15650 Tel: (724)539-1833 Fax: (724)539-6620 DUNS #: 107329708

Pack Slip

Bill-to:

Delphi Mechatronics Systems

615 Elca Lane, Suite A Brownsville, TX 78521 Pack Slip No

Pack Slip Date: Payment Terms:

Page:

LTD15141

10/03/05 Net 30

4

Ship Code:

BROWNSVILL

Ship-to:

Delphi Mechatronics Systems

Delphi Mechatronics Systems

615 Elca Lane, Suite A Brownsville, TX 78521 Your PO No:

FOB: Ship Via: 9571-054161

Latrobe, PA UPS/ORANGE

	Rev. No.:	Description:	Quantity Shipped:		Standard Pack:	Weight:	_
Part Number:		outside air temp sensor	3,200	2	1,600	28	
15416386	03	Obliside all feltip selles					

14)

Description of the second of t

TRACKING# 1Z2655171242367136

REF 1: REF 2:

HANDLING CHARGE \$0.00

REFERENCE RATE CHARGES: SERVICE RS \$0,00 COD \$0.00 \$0.00 HZMT \$0.00 SD \$0.00 DC \$0.00 SP \$0.00 NTFY \$0.00 AH \$0.00 REF+HANDLING \$48.20 TOT REF CHG \$48.20



Tracking Detail

Your package has been delivered.

Tracking Number:

1Z 265 517 12 4236 713 6

Type:

Package

Status:

Delivered

Delivered on:

10/06/2005 11:05 A.M.

Signed by:

MARCOS M

Location:

DOCK

Delivered to:

BROWNSVILLE, TX, US

Service Type:

3 DAY SELECT

Package Progress

Location	Date	Local Time	Description
BROWNSVILLE,	10/06/2005	11:05 A.M.	DELIVERY
TX, US	4.3		

Tracking results provided by UPS: 02/21/2007 11:39 A.M. EST (USA)

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